

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION  
AGENCY COMMENTS ON THE DEPARTMENT OF ENERGY, FERNALD AREA  
OFFICE WELL ABANDONMENT LETTER (DOE-0766-95)**

**07/17/96**

**DOE-1121-96  
DOE-FN      EPAS  
4  
RESPONSES**



## Department of Energy

### Ohio Field Office Fernald Area Office

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JUL 17 1996

DOE-1121-96

Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE DEPARTMENT OF ENERGY, FERNALD AREA OFFICE WELL  
ABANDONMENT LETTER (DOE-0766-95)**

- Reference:
- 1) Letter, T. Schneider (OEPA) to J. Reising (DOE-FN), "DOE FEMP MSL 531-0297 Hamilton County Comments: Well Abandonment Letter," dated May 30, 1996.
  - 2) Letter, J. A. Saric (U.S. EPA) to J. Reising (DOE-FN), "Well Abandonment," dated June 28, 1996.
  - 3) Letter, J. Reising (DOE-FN) to T. Schneider (OEPA) and J. A. Saric (U.S. EPA), "DOE-0766-95: Well Abandonment," dated April 25, 1996.

This letter serves to transmit responses to Ohio Environmental Protection Agency's (OEPA) comments (Reference 1) on the Fernald Environmental Management Project (FEMP) well plugging and abandonment activities scheduled for Fiscal Year (FY) 1996. The U.S. Environmental Protection Agency (U.S. EPA) approved the abandonment approach and schedule (Reference 2) outlined in the Department of Energy (DOE) well abandonment letter (Reference 3).

The following are responses to OEPA's comments:

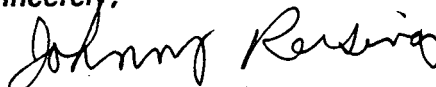
Commenting Organization: Ohio EPA      Commentor: DDAGW  
Section Number:      Page Number: 2      Line Number: First Partial Para      Code:  
Original Comment Number 1  
Comment: Critical wells will be replaced, not may be replaced. Additionally, the proposal to replace some of these wells with Geoprobe samples is not acceptable. If the wells are determined to be critical to ongoing ground water monitoring programs, then they will be replaced with properly constructed monitoring wells in acceptable locations.  
Response: Critical well locations will be replaced with monitoring wells. The geoprobe technique will only be used to determine the best location for critical wells. Geoprobe can be used to quickly, easily and cost effectively collect water samples for analysis. The fast turn-around time from the sample collection and analysis of geoprobe water samples will be used to determine optimum well locations.  
Action: None required.

Commenting Organization: Ohio EPA      Commentor: DDAGW  
Section Number:      Page Number: 2      Line Number: Bullet 1      Code:  
Original Comment Number 2  
Comment: The hole left, once the casing has been removed, should be grouted to the surface.  
Response: Type 1 wells located inside buildings will be filled temporarily with bentonite. The well casing will be removed later as the building foundations are excavated. If the excavation is not as deep as the well, the remaining well borehole will be sealed with grout.  
Action: Well casings will be completely removed during excavation activities and the boreholes will be sealed with grout.

In addition to the above comments, the OEPA also identified the concern that critical wells have not been identified in regard to long-term groundwater monitoring and that there is no discussion of which wells will be replaced, or how, where, and when these activities will occur. Although critical wells for monitoring were not identified in the DOE well abandonment letter, they will be identified in the Integrated Environmental Monitoring Plan (IEMP) which will be submitted for agency review on August 1, 1996. During the review of the IEMP, the U.S. EPA and OEPA will have the opportunity to evaluate the proposed monitoring well network that will be used to assess groundwater remedy performance. It should also be noted that every attempt will be made to preserve all existing wells screened in the Great Miami Aquifer because there may be a need in the future for monitoring during the evolution of the remediation system.

If you have any questions regarding the comment responses provided, please contact Kathi Nickel at (513) 648-3166.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FN:Nickel

cc:

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